

FREDERICK & CLAUDETTE BIHM**15TH JUDICIAL DISTRICT COURT****VERSUS****DOCKET NO. 201910080-K****LIBERTY MUTUAL INS. CO. and
LIBERTY PERSONAL INS. CO.****ACADIA PARISH, LOUISIANA**

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, come Plaintiffs, **FREDERICK & CLAUDETTE BIHM**, a persons of full age of majority and a residents of Rayne, Louisiana, and who aver as follows:

1.

Made defendants herein:

- (A) **LIBERTY MUTUAL INSURANCE COMPANY** ("Liberty Mutual"), a foreign corporation authorized to do and doing business within the State of Louisiana, and as such is in the jurisdiction of this Honorable Court and who may be served through the Louisiana Secretary of State, 8585 Archives Avenue, Baton Rouge, LA 70809; and
- (B) **LIBERTY PERSONAL INSURANCE COMPANY** ("Liberty Mutual"), a foreign corporation authorized to do and doing business within the State of Louisiana, and as such is in the jurisdiction of this Honorable Court and who may be served through the Louisiana Secretary of State, 8585 Archives Avenue, Baton Rouge, LA 70809.

2.

This cause of action arises out of an automobile accident occurring on February 7, 2018, in Duson, Acadia Parish, Louisiana.

3.

On or about February 7, 2018, Plaintiff, Frederick Bihm, was operating a 2006 Chevrolet Silverado, bearing Louisiana license plate W497585, in a northerly direction on Highway 95 in Duson, Louisiana.

4.

At all times material, Plaintiff, Claudette Bihm, was a passenger in Plaintiff, Frederick Bihm's vehicle.

5.

On or about February 7, 2018, Edna Coffman was operating 2006 Ford Focus, bearing Louisiana license plate 879AOA, in a southerly direction on Highway 95 in Duson, Louisiana.

6.

Due to the inattention, negligence, and fault created by Edna Coffman, Ms. Coffman crossed the center line, causing a violent head on collision with Plaintiff's vehicle.

7.

On or about February 7, 2018, Plaintiff, Frederick Bihm, had in full force and effect a policy of insurance commonly known as an automobile liability policy and a automobile uninsured or underinsured policy, which was issued through defendant, Liberty Mutual Insurance Company, under Policy No. A0F-298-495341-40, which provided automobile uninsured and/or underinsured insurance coverage for the 2006 Chevrolet Silverado, bearing Louisiana license plate W497585, as well as to Plaintiff, Frederick Bihm, and Plaintiff, Claudette Bihm, for the accident at issue, and, as such, is liable from an uninsured/underinsured standpoint for any negligence and/or the fault on the part of the individual in causing the accident at issue.

8.

Edna Coffman was negligent and/or at fault in causing this accident and the Plaintiff, Frederick Bihm's injuries, which negligence includes, but is not limited to, the following acts to-wit:

- (1) Negligently being inattentive;
- (2) Negligently failing to maintain a proper lookout;
- (3) Negligently operating her vehicle in a reckless and careless manner;
- (4) Failing to see what he should have seen and/or to do what he should have done under the circumstances in order to avoid this accident; and
- (5) Any and all other acts of negligence and/or fault which may be shown at the trial of this matter.

9.

Edna Coffman was negligent and/or at fault in causing this accident and the Plaintiff, Claudette Bihm's injuries, which negligence includes, but is not limited to, the following acts to-wit:

- (1) Negligently being inattentive;
- (2) Negligently failing to maintain a proper lookout;
- (3) Negligently operating her vehicle in a reckless and careless manner;
- (4) Failing to see what he should have seen and/or to do what he should have done under

the circumstances in order to avoid this accident; and

- (5) Any and all other acts of negligence and/or fault which may be shown at the trial of this matter.

10.

As a result of the negligence and/or fault of Edna Coffman, Plaintiff, Frederick Bihm, has suffered and sustained injuries to his neck, knee and body as a whole, and as such, is entitled to such damages as are reasonable in the premises.

11.

As a result of the negligence and/or fault of Edna Coffman, Plaintiff, Claudette Bihm, has suffered and sustained injuries to her hip, wrist, back, knee and body as a whole, and as such, is entitled to such damages as are reasonable in the premises.

12.

As a result of the injuries sustained in the February 7, 2018 accident, Plaintiff, Frederick Bihm, suffered damages, including but not limited to, the following to-wit:

- (1) Past and future medical expenses;
- (2) Past and future physical pain and suffering;
- (3) Past and future mental and emotional anguish;
- (4) Past and future disability;
- (5) Past and future loss of enjoyment of life;
- (6) Future loss of earning capacity;
- (7) Past lost wages; and
- (8) Other such damages as may be proven at the trial of this matter.

13.

As a result of the injuries sustained in the February 7, 2018 accident, Plaintiff, Claudette Bihm, suffered damages, including but not limited to, the following to-wit:

- (1) Past and future medical expenses;
- (2) Past and future physical pain and suffering;
- (3) Past and future mental and emotional anguish;
- (4) Past and future disability;
- (5) Past and future loss of enjoyment of life;
- (6) Future loss of earning capacity;

- (7) Past lost wages; and
- (8) Other such damages as may be proven at the trial of this matter.

14.

Plaintiffs, Frederick and Claudette Bihm, provided defendant, Liberty Mutual Insurance Company, adequate proof of loss confirming there was insufficient primary liability limits to cover Frederick and Claudette Bihm's damages as a result of the accident at issue.

15.

Plaintiffs, Frederick and Claudette Bihm, provided Defendant, Liberty Mutual, via correspondence on November 9, 2018, a satisfactory proof of loss relative to the injuries sustained by Frederick and Claudette Bihm. To date, good faith unconditional tenders equivalent to plaintiffs' damages have not been issued.

16.

Along with the proof of loss provided to Liberty Mutual, Plaintiffs, Frederick and Claudette Bihm, made a formal demand for a tender of uninsured motorist benefits within 30 days as required by LSA-R.S. 22:658 (Redesignated as La. R.S. 22:1892, by Acts 2008, No. 415).

17.

Liberty Mutual has refused to make a reasonable tender of uninsured motorist benefits as required by LSA-R.S. 22:658 (Redesignated as La. R.S. 22:1892, by Acts 2008, No. 415), despite having been provided written proof of loss accompanied by a formal demand for such tender within the delays allowed by Louisiana law.

18.

Due to Liberty Mutual's refusal to make a reasonable tender of uninsured motorist benefits as required by LSA-R.S. 22:658 (Redesignated as La. R.S. 22:1892, by Acts 2008, No. 415), Plaintiffs, Frederick and Claudette Bihm, are entitled to a penalty of 50% of the amount found to be due from Liberty Mutual, as well as reasonable attorney's fees and costs.

19.

As a result of the accident occurring on February 7, 2018, Plaintiff, Frederick Bihm, has suffered and sustained damages to his neck, knee and body as a whole, which has necessitated and will continue to necessitate medical treatment, such that his damages arising out of the accident in question are in excess of \$50,000, exclusive of interest and costs.

20.

As a result of the accident occurring on February 7, 2018, Plaintiff, Claudette Bihm, has suffered and sustained damages to her hip, wrist, back, knee and body as a whole, which has necessitated and will continue to necessitate medical treatment, such that her damages arising out of the accident in question are in excess of \$50,000, exclusive of interest and costs.

21.

On January 8, 2019, undersigned counsel provided defendants with a letter of representation, requesting contact and other documentation relative to the subject claim. To date, Plaintiff's have failed to respond.

22.

By multiple email and correspondence, Plaintiffs, Frederick and Claudette Bihm, have requested an appropriate response to their satisfactory proof of loss previously provided to Defendant, Liberty Mutual Insurance Company.

23.

Despite satisfactory proof of loss which fully apprised the Defendant of the Plaintiffs' claim more that sixty days have passed, and the Defendant refuses to appropriately respond.

24.

Defendant's election to not appropriately respond is unjust, unreasonable, arbitrary and capricious and constitutes bad faith adjusting practices under La. R.S. 22:1793.

25.

Due to Liberty Mutual's refusal to make a reasonable tender as required by LSA-R.S. 22:1973, Plaintiffs, Frederick and Claudette Bihm, are entitled to "penalties assessed against the insurer in an amount not to exceed two times the damages sustained or five thousand dollars, whichever is greater.

WHEREFORE, Plaintiffs, Frederick and Claudette Bihm, pray that Defendants, Liberty Mutual Insurance Company and Liberty Personal Insurance Company, be served with a copy of this Petition for Damages and that it be cited to appear and answer hereto, and after the lapse of all legal delays and due proceedings had, there be judgment rendered herein and in favor of Plaintiffs, Frederick and Claudette Bihm, and against Defendants, Liberty Mutual Insurance Company and Liberty Personal Insurance Company, for all such damages as are reasonable under the premises,

together with legal interest from the date of judicial demand until paid, and that defendant be required to pay all costs of these proceedings, as well as any and all additional and /or alternative relief, as the law, equity or nature of the case may allow, including attorney's fees, and costs.

Respectfully submitted:

BY: 

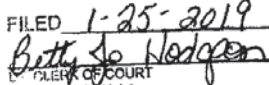
JOSEPH F. GAAR, JR. # 16927
JASON M. WELBORN # 26548
LUCAS S. COLLIGAN # 31671
JACOB H. HARGETT # 32490
617 S. Buchanan Street
Lafayette, Louisiana 70501
Telephone: (337) 233-3185
Facsimile: (337) 233-0690
Attorneys for Plaintiffs,
FREDERICK & CLAUDETTE BIHM

PLEASE SERVE:

LIBERTY MUTUAL INSURANCE COMPANY
through Louisiana Secretary of State
8585 Archives Ave.
Baton Rouge, LA 70809

LIBERTY PERSONAL INSURANCE COMPANY
through Louisiana Secretary of State
8585 Archives Ave.
Baton Rouge, LA 70809

REC'D BY AP COC
2019 JAN 25 AM 9:49:13

FILED 1-25-2019

CLERK OF COURT
ACADIA PARISH, LA

FREDERICK & CLAUDETTE BIHM**15TH JUDICIAL DISTRICT COURT****VERSUS****DOCKET NO. 201910090-K****LIBERTY MUTUAL INS. CO. and
LIBERTY PERSONAL INS. CO.****ACADIA PARISH, LOUISIANA**

REQUEST FOR NOTICE

**TO: Honorable Robert Barousse
Acadia Parish Clerk of Court**

NOW INTO COURT, through undersigned counsel, come Plaintiffs, **FREDERICK & CLAUDETTE BIHM**, who requests, in accordance with the Louisiana Code of Civil Procedure, they be given written notice by mail, ten (10) days in advance of the date fixed for trial or any hearing of the above-captioned case, whether on Exceptions, Motions, Rules or the Merits. Plaintiff also requests immediate notice of any and all Orders or Judgments, whether interlocutory or final, made or rendered in their case upon rendition thereof, as provided for by the Louisiana Code of Civil Procedure, including Notice of Judgment in the event that this case is taken under advisement, or if the Judgment is not signed at the conclusion of the trial.

Respectfully submitted:

BY: 

**JOSEPH F. GAAR, JR. # 16927
JASON M. WELBORN # 26548
LUCAS S. COLLIGAN # 31671
JACOB H. HARGETT # 32490
617 S. Buchanan Street
Lafayette, Louisiana 70501
Telephone: (337) 233-3185
Facsimile: (337) 233-0690
Attorneys for Plaintiffs,
FREDERICK & CLAUDETTE BIHM**

REC'D BY AP COG
2019 JAN 25 AM 9:49:21

FILED

1-25-2019
Betty S. Hodgson
DY. CLERK OF COURT
ACADIA PARISH, LA

ACADIA PARISH	
Daily Log Receipt	
Date: 01/25/2019	Time: 09:55:10
Suit No. 201910080	
FREDERICK BIHM AND CLAUDETTE	
VS	
LIBERTY MUTUAL INS CO AND	
Date: 01/25/2019	Check No: 33019
Amount: \$400.00	
Comments:	
P1- PETITION FOR DAMAGES	
Remitted By:	
JOSEPH F. GAAR, JR.	
Deputy Clerk	

KR

JOSEPH F. GAAR, JR.

33019

To:
Acadia Parish Clerk of Court

Check Date: 01/22/19

Amount: 400.00

Memo:
Frederick & Claudette Bihm

LAW OFFICES OF
JOSEPH F. GAAR, JR.
A PROFESSIONAL LAW CORPORATION

JOSEPH F. GAAR, JR.
E-MAIL: joseph@gaarlaw.com

JASON M. WELBORN
E-MAIL: jason@gaarlaw.com

LUCAS S. COLLIGAN
E-MAIL: lucas@gaarlaw.com

JACOB HARGETT
E-MAIL: jacob@gaarlaw.com

January 24, 2019

Mailing Address:
Post Office Drawer 2069
Lafayette, Louisiana 70502

Physical Address:
617 S. Buchanan Street
Lafayette, Louisiana 70501

TELEPHONE: (337) 233-3185
TELECOPY: (337) 233-0690

Honorable Robert T. Barousse
Acadia Parish Clerk of Court
500 North Parkerson Ave.
Crowley, LA 70526

Re: ***Frederick & Claudette Bihm v. Liberty Mutual, et al;*** Docket No.: 201910089 In
the 15th Judicial District Court, Parish of Acadia, State of Louisiana.

Dear Honorable Barousse:

Please find enclosed the original and three (3) copies of the following:

1. Petition for Damages;
2. Request for Notice; and
3. Louisiana Civil Case Reporting form.

Please file the original into the record of the Court on behalf of Plaintiff and return a conformed copy to the undersigned. Our firm check in the amount of \$450.00 is enclosed for this request.

Additionally, we ask that the documents be served upon the following:

LIBERTY MUTUAL INSURANCE COMPANY
through Louisiana Secretary of State
8585 Archives Ave.
Baton Rouge, LA 70809

LIBERTY PERSONAL INSURANCE COMPANY
through Louisiana Secretary of State
8585 Archives Ave.
Baton Rouge, LA 70809

REC'D BY AP COC
2019 JAN 25 AM9:48:34

Thank you, in advance, for your courtesies. With kindest personal regards, I remain

Very truly yours,


LUCAS S. COLLIGAN


LSC/chr
Enclosures

REC'D BY AP COC
2019 JAN 25 AM9:48:42

LOUISIANA CIVIL CASE REPORTING
Civil Case Cover Sheet - LA. R.S. 13:4688 and
Part G, §13, Louisiana Supreme Court General Administrative Rules

This civil case cover sheet shall be completed by counsel for the petitioner, counsel's authorized representative, or by the self-represented litigant (if not represented by counsel) and submitted with the original petition filed with the court. The information should be the best available at the time of filing. This information does not constitute a discovery request, response or supplementation, and is not admissible at trial.

Suit Caption:

Frederick³ Claudette
Bism

vs.

Liberty Mutual Ins. Co.

Liberty Personal Ins. Co.

Court: *15th JDC*

Docket Number: *201900080-K*

Parish of Filing: *Acadia*

Filing Date: *01/25/2019*

Name of Lead Petitioner's Attorney:

Lucas S. Colligan

Name of Self-Represented Litigant:

Number of named petitioners: *2*

Number of named defendants: *2*

Type of Lawsuit: Please check the categories which most appropriately apply to this suit (no more than 3 categories should be checked):

☒ Auto: Personal injury
☐ Auto: Wrongful Death
☐ Asbestos: Property Damage
☐ Product Liability
☐ Intentional Bodily Injury
☐ Business Tort
☐ Defamation
☐ Environmental Tort
☐ Intellectual Property
☐ Legal Malpractice
☐ Other Professional Malpractice
☐ Maritime
☐ Wrongful Death
☐ General Negligence

☐ Auto: Property Damage
☐ Auto: Uninsured Motorist
☐ Asbestos: Personal Injury/Death
☐ Premise Liability
☐ Intentional Property Damage
☐ Unfair Business Practice
☐ Fraud
☐ Professional Negligence
☐ Medical Malpractice
☐ Toxic Tort
☐ Other Tort (described below)
☐ Redhibition
☐ Glass Action (nature of case)

Please briefly described the nature of the litigation in one sentence of additional detail:

See petition for Damages

Following the completion of this form by counsel, counsel's representative, or by the self-represented litigant, this document will be submitted to the Office of the Judicial Administrator, Supreme Court of Louisiana, by the Clerk of Court.

Name, address and contact information of the person completing this form:

Name: *Lucas S. Colligan*

Signature: *Lucas S. Colligan*

Address: *617 S. Buchanan*

Lafayette, LA 70501

Phone number: *337.233.3185*

E-mail address: *lucas@gaarlaw.com*

Robert T. "Robby" Barousse

Clerk of Court - Acadia Parish
500 NE Court Circle, Crowley, LA 70526
P.O. Box 922, Crowley, LA 70527-0922
Phone: 337-788-8881

FILE COPY

January 30, 2019

To: Civil Sheriff
East Baton Rouge Parish
P O Box 3277
Baton Rouge, La 70821

**FREDERICK BIHM AND CLAUDETTE BIHM
VERSUS DOCKET #: 201910080 K
LIBERTY MUTUAL INS CO AND LIBERTY PERSONAL INS CO**

Dear Sheriff:

Please make service as indicated on the attached CITATION

After service has been made, please make your return at the bottom of the "Return" copy and return same for filing.

PLEASE NOTE THAT THERE IS A CHECK ENCLOSED FOR YOUR FEES IN THE AMOUNT OF \$39.36 AND A CHECK IN THE AMOUNT OF \$50.00 FOR THE SECRETARY OF STATE FEES.

Thank you in advance for your usual assistance and cooperation.

I am Sincerely,



Betty Jo Hodgson
Deputy Clerk of Court
Acadia Parish

enclosures

**CITATION
ACADIA PARISH, LOUISIANA
15th JUDICIAL DISTRICT COURT**

FILE COPY

**FREDERICK BIHM AND CLAUDETTE BIHM
VERSUS 201910080 K
LIBERTY MUTUAL INS CO AND LIBERTY PERSONAL INS CO**

**To: LIBERTY PERSONAL INSURANCE COMPANY
Through Louisiana Secretary Of State
8585 Archives Ave
Baton Rouge, LA 70809**

Attached to this citation is a certified copy of the petition. The petition tells you what you are being sued for.

You must EITHER do what the petition asks OR, within (15) days after you have received this document, you must file an answer or other legal pleadings in the office of the Clerk of Court at the Courthouse, Court Circle, Crowley, Louisiana.

If you do not do what the petition asks, or if you do not file an answer of legal pleadings within fifteen (15) days, a judgment may be entered against you without further notice.

This citation was issued by the Clerk of Court for Acadia Parish, on January 30, 2019

ROBERT T. BAROUSSE, CLERK OF COURT

Betty Jo Hodgson

BY: _____

Deputy Clerk of Court
Acadia Parish

ATTORNEY:
LUCAS S COLLIGAN
617 S BUCHANAN ST
LAFAYETTE, LA 70501
337.233.3185

Attached are the following documents: Petition For Damages
____ INTERROGATORIES ____ REQUEST FOR PRODUCTION OF DOCUMENTS ____ OTHER

EFFECTIVE IMMEDIATELY: NO CELL PHONES OR RECORDING DEVICES ALLOWED IN THE COURTHOUSE.

SHERIFF'S RETURN

Received the within notice and copies of the same, on the _____ day of _____
and on the _____ day of _____ 20____, served a copy of the within notice on:

(personal service)

(domiciliary service)

the parties herein named by handing same to them in person.

Deputy Sheriff

Returned and filed: _____

Deputy Clerk

ADDITIONAL INFORMATION

THESE DOCUMENTS MEAN YOU HAVE BEEN SUED. LEGAL ASSISTANCE IS ADVISABLE AND YOU SHOULD CONTACT A LAWYER IMMEDIATELY. JUDGES AND COURT PERSONNEL ARE NOT PERMITTED TO GIVE LEGAL ADVICE.

Robert T. "Robby" Barousse

Clerk of Court - Acadia Parish
500 NE Court Circle, Crowley, LA 70526
P.O. Box 922, Crowley, LA 70527-0922
Phone: 337-788-8881

FILE COPY

January 30, 2019

To: Civil Sheriff
East Baton Rouge Parish
P O Box 3277
Baton Rouge, La 70821

**FREDERICK BIHM AND CLAUDETTE BIHM
VERSUS DOCKET #: 201910080 K
LIBERTY MUTUAL INS CO AND LIBERTY PERSONAL INS CO**

Dear Sheriff:

Please make service as indicated on the attached CITATION

After service has been made, please make your return at the bottom of the "Return" copy and return same for filing.

PLEASE NOTE THAT THERE IS A CHECK ENCLOSED FOR YOUR FEES IN THE AMOUNT OF \$39.36 AND A CHECK IN THE AMOUNT OF \$50.00 FOR THE SECRETARY OF STATE FEES.

Thank you in advance for your usual assistance and cooperation.

I am Sincerely,



Betty Jo Hodgson
Deputy Clerk of Court
Acadia Parish

enclosures

FILE COPY

CITATION
ACADIA PARISH, LOUISIANA
15th JUDICIAL DISTRICT COURT

FREDERICK BIHM AND CLAUDETTE BIHM
VERSUS 201910080 K
LIBERTY MUTUAL INS CO AND LIBERTY PERSONAL INS CO

To: LIBERTY MUTUAL INSURANCE COMPANY
Through Louisiana Secretary Of State
8585 Archives Ave
Baton Rouge, LA 70809

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This citation was issued by the Clerk of Court for Acadia Parish, on January 30, 2019

ROBERT T. BAROUSSE, CLERK OF COURT

Betty Jo Hodgson

BY: _____
Deputy Clerk of Court
Acadia Parish

ATTORNEY:
LUCAS S COLLIGAN
617 S BUCHANAN ST
LAFAYETTE, LA 70501
337.233.3185

Attached are the following documents: Petition For Damages
____ INTERROGATORIES ____ REQUEST FOR PRODUCTION OF DOCUMENTS ____ OTHER

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SHERIFF'S RETURN

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____ (personal service) _____ (domiciliary service) _____

the parties herein named by handing same to them in person.

Deputy Sheriff

Returned and filed: _____

Deputy Clerk

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Robert T Barousse
Acadia Clerk of Court
PO Box 922
Crowley, LA 70527-0922

**BILLING
STATEMENT
AS OF
03/01/2019**

Suit No. 201910080

JOSEPH F GARR JR
LUCAS S COLLIGAN
617 S BUCHANAN ST
LAFAYETTE, LA 70501

FREDERICK BIHM AND CLAUDETTE BIHM
Vs
LIBERTY MUTUAL INS CO AND LIBERTY

PLAINTIFF #1

TOTAL DEPOSIT	\$400.00
TOTAL CHARGES	\$-405.47
CURRENT BALANCE	\$-5.47

This is an open bill. Costs have been cast and are due at this time. No other pleadings will be accepted and processed until these costs have been paid. Our office is now accepting credit cards in addition to cash, check, or money order. Please call our office at 337-788-8881 and speak to the accounting department if you have any questions.

AMOUNT DUE	\$5.47
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TOTAL PAYMENT DUE	\$5.47
-------------------	--------

PLEASE SUBMIT PAYMENT ASAP. THANK YOU!

REC'D BY AP CEC
2019 MAR 14 AM 9:48:25

Please forward this bill onto your client or provide our office with a current address. Thank You for your assistance!

ACADIA PARISH

Daily Log Receipt

Date: 03/14/2019 Time: 10:14:45

Suit No. 201910080

FREDERICK BIHM AND CLAUDETTE

VS

LIBERTY MUTUAL INS CO AND

Date: 03/14/2019 Check No: 33223

Amount: \$5.47

Comments:

P-1 / BILLING STATEMENT

Remitted By:

JOSEPH F GAAR JR

Deputy Clerk

ml

JOSEPH F. GAAR, JR.

33223

To:
Acadia Parish Clerk of Court

Check Date: 03/06/19

Amount: 5.47

Memo:
Frederick & Claudette Bihm

**CITATION
ACADIA PARISH, LOUISIANA
15th JUDICIAL DISTRICT COURT**

RETURN TO
CLERK'S OFFICE

**FREDERICK BIHM AND CLAUDETTE BIHM
VERSUS 201910080 K
LIBERTY MUTUAL INS CO AND LIBERTY PERSONAL INS CO**

**To: LIBERTY PERSONAL INSURANCE COMPANY
Through Louisiana Secretary Of State
8585 Archives Ave
Baton Rouge, LA 70809**

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This citation was issued by the Clerk of Court for Acadia Parish, on January 30, 2019

ROBERT T. BAROUSSE, CLERK OF COURT

Betty Jo Hodgson

BY:

Deputy Clerk of Court
Acadia Parish

ATTORNEY:
LUCAS S COLLIGAN
617 S BUCHANAN ST
LAFAYETTE, LA 70501
337.233.3185

Made service on the named party through the
Office of the Secretary of State on

Attached are the following documents: Petition For Damages, a copy of this document to
____ INTERROGATORIES, REQUEST FOR PRODUCTION OF DOCUMENTS
**EFFECTIVE IMMEDIATELY: NO CELL PHONES OR RECORDING DEVICES ALLOWED IN THE
COURTHOUSE.**

SHERIFF'S RETURN

Received the within notice and copies of the same, on the _____ day of _____
and on the _____ day of _____ 20____, served a copy of the within notice on:

(personal service)

(domiciliary service)

the parties herein named by handing same to them in person.

Returned and filed:

2-25-2019

Deputy Sheriff

Deputy Clerk

ADDITIONAL INFORMATION

THESE DOCUMENTS MEAN YOU HAVE BEEN SUED. LEGAL ASSISTANCE IS ADVISABLE AND YOU SHOULD CONTACT A LAWYER IMMEDIATELY. JUDGES AND COURT PERSONNEL ARE NOT PERMITTED TO GIVE LEGAL ADVICE.

FEB 18 2019
a copy of this document to
KATHY DARDEN
D.E. CUMMINS #1155
Deputy Sheriff, Parish of East Baton Rouge, Louisiana

RECEIVED AND FILED
FEB 25 2019
CLERK OF COURT
ACADIA PARISH

**CITATION
ACADIA PARISH, LOUISIANA
15th JUDICIAL DISTRICT COURT**

RETURN TO
CLERK'S OFFICE

**FREDERICK BIHM AND CLAUDETTE BIHM
VERSUS 201910080 K
LIBERTY MUTUAL INS CO AND LIBERTY PERSONAL INS CO**

**To: LIBERTY MUTUAL INSURANCE COMPANY
Through Louisiana Secretary Of State
8585 Archives Ave
Baton Rouge, LA 70809**

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ROBERT T. BAROUSSE, CLERK OF COURT

Betty Jo Hodgson

BY: _____

Deputy Clerk of Court
Acadia Parish

I made service on the named party through the
Office of the Secretary of State on

ATTORNEY:
LUCAS S COLLIGAN
617 S BUCHANAN ST
LAFAYETTE, LA 70501
337.233.3185

Attached are the following documents: Petition For Damages
____ INTERROGATORIES ____ REQUEST FOR PRODUCTION OF DOCUMENTS

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(personal service)

(domiciliary service)

the parties herein named by handing same to them in person.

Returned and filed: 2-25-2019

Deputy Sheriff

Deputy Clerk

ADDITIONAL INFORMATION

THESE DOCUMENTS MEAN YOU HAVE BEEN SUED. LEGAL ASSISTANCE IS ADVISABLE AND YOU SHOULD CONTACT A LAWYER IMMEDIATELY. JUDGES AND COURT PERSONNEL ARE NOT PERMITTED TO GIVE LEGAL ADVICE.

FEB 16 2019

